

1 ROBERT GOLDSTEIN (SBN 184226)
2 LIAT BLUM (SBN 286715)
3 Law Offices of Robert L. Goldstein
4 100 Bush Street #501
5 San Francisco, CA 94104
6 Phone: (415) 391-8700
7 Fax: (415) 391-8701

8 Attorney for Debtor

9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 In re

) Case No.: 11-41892

)
) Chapter 13

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14
15 MATTHEW F. PELLOUCHOUD
16 MARILYN A. PELLOUCHOUD

)
) **RESPONSE TO MOTION TO CONVERT**
) **CHAPTER 13 CASE TO CHAPTER 7**

17 Debtor.

)
) Date: October 21, 2014

) Time: 1:30 PM

) Judge: Hon. Roger L. Efremsky

20) Place: 1300 Clay Street, Courtroom 201
21) Oakland, CA
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23 TO THE HONORABLE ROGER L. EFREMSKY:

24 Debtors Matthew and Marilyn Pellouchoud ("Debtors") by and through their attorney of
25 record, do hereby respond respectfully to the Motion to Convert Chapter 13 Case to Chapter 7 as
26 follows:

- 27 1. The Pellouchouds deny all of the allegations that have been asserted against them and
28 assert that their Chapter 13 case was filed properly and in good faith.

- 1 2. The parties have been engaging in discussions about the issues involved in Motion to
2 Convert (hereafter "Motion") and efficient steps necessary to resolve issues.
3 3. Any additional response will be filed subsequently.
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5 WHEREFORE, the Debtors respectfully request that the Court deny this Motion, that the
6 Court allow sufficient time for the Pellouchouds to engage in additional fact-finding and to
7 respond more thoroughly to this Motion and, that the matter be set for an evidentiary hearing
8 and/ or that this Court provides any other appropriate relief.
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10 Respectfully submitted,
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12 Law Offices of Robert L. Goldstein

13 Date: October 20, 2014

14 /s/ Liat Blum
15 Liat Blum, Esq.
16 Attorney for Debtor
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